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May 6, 2021

VIA E-FILE ONLY

The Honorable Marian W. Payson
United States Magistrate Judge
United States District Court
Western District of New York
100 State Street
Rochester, New York 14614

Re: *Doreen Raimondi v. Avaya Inc., et al*
Civil No.: 20-cv-06566 (FPG-MWP)

Dear Judge Payson:

We represent defendants in connection with the above matter, and I am writing, on consent of all parties, to respectfully request that the remaining deadlines contained in the Scheduling Order be extended by 60 days. More particularly, we request that the discovery completion date be extended from June 15, 2021 to August 16, 2021, that all motions to compel be filed no later than July 16, 2021, and that the dispositive motion date be extended from July 15, 2021 to September 13, 2021.

To date, the parties have made initial exchanges of paper discovery, and are working on supplementation. Production of ESI is underway. The parties anticipate four (4) party depositions and between one (1) to four (4) non-party depositions. This is the parties' first request for an extension of the Scheduling Order, and we do not anticipate the need for further extensions.

Respectfully submitted,

/s/ Glen P. Doherty

Glen P. Doherty

cc: Michael J. Willemin, Esq.
(via e-file only)